

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

<hr/> IN RE: AQUEOUS FILM-FORMING FOAMS PRODUCTS LIABILITY LITIGATION	) ) ) ) ) ) )	MDL No. 2:18-mn-2873-RMG  <b>This Document Relates to Case No. 2:18-cv-03489-RMG</b>
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**DECLARATION OF T. ROE FRAZER II IN SUPPORT OF PLAINTIFF NEW JERSEY  
AMERICAN WATER COMPANY, INC.’S MOTION FOR LEAVE TO AMEND  
COMPLAINT**

Pursuant to 28 U.S.C. § 1746, I, T. Roe Frazer II, declare as follows:

1. I am one of the counsel for Plaintiff New Jersey American Water Company, Inc. (“NJAW”) and submit this declaration in support of Plaintiff’s motion for leave to amend its complaint in this action. I serve on the Plaintiff’s Executive Committee, as well as the Discovery Committee, and as Co-Chair of the Private Water Provider Committee.

2. Attached hereto as **Exhibit A** is Plaintiff’s proposed Amended Complaint, in a redline comparison with Plaintiff’s original Complaint. Attached hereto as **Exhibit B** is a clean version of Plaintiff’s proposed Amended Complaint.

3. Pursuant to this Court’s Case Management Order Nos. 2 and 3, I affirm that prior to filing this motion, I conferred with Co-Lead Counsel for Plaintiffs about this motion, and they have authorized this filing.

4. I further affirm that pursuant to Local Rule 7.02, I conferred with Co-Lead Counsel for Defendants and Liaison Counsel for Defendants in person regarding this motion. They indicated that Defendants do not object to the filing of Plaintiff’s motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that I executed this Declaration on March 18, 2020.

/s/ T. Roe Frazer II